

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MALEEHA AHMAD, et al.,)
)
 Plaintiffs,) Case No. 4:17-cv-2455-CDP
)
v.)
)
 CITY OF ST. LOUIS,)
)

PROTECTIVE ORDER

Pursuant to F.R.Civ.P. 26(c)(1), by consent of the parties, it is ORDERED as follows:

1. Material produced in response to requests for production of documents in this action may be designated by the producing party as "attorneys/experts eyes only," and such material shall not be disclosed or disseminated by counsel other than to or among counsel and identified experts, except by consent of the producing party or order of Court. The producing party shall clearly designate material that is intended as "attorneys/experts eyes only." Upon the conclusion of this action, all such material designated "attorneys/experts eyes only" shall be returned to the producing party and all electronic copies or representations of such material shall be destroyed.

Exhibit 1

3/21/19

2. Material constituting privileged matter that is inadvertently disclosed shall, upon request of the producing party, be returned to the producing party forthwith and any and all copies or electronic copies of such material shall be destroyed. No such material shall be utilized in any manner in discovery or at trial unless by consent of the producing party or by order of court. If the receiving party objects to the return of such material, the parties shall then proceed in accordance with Rule 26(c)(1) to resolve any dispute.

3. The parties shall reasonably apply the designation of "attorneys/experts eyes only" to material and such designation shall be applicable only to personnel records, criminal records not otherwise public, and operational planning materials of law enforcement agencies not otherwise public. The designation shall be made in a manner that enables the receiving party to readily identify the material so designated. The receiving party, upon review of material so designated, may object to its designation as "attorneys/experts eyes only" and the parties shall then proceed in accordance with Rule 26(c)(1) to resolve any dispute.

SO ORDERED:

United States District Judge

Dated: _____, 2019